

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

WILLIAM F. DAVIS, III, :
 :
 Plaintiff, :
 :
 V. : Civ No. 04-209-SLR
 :
 RAPHAEL WILLIAMS, (FNU) ROBINSON; :
 BETTY (LNU), :
 :
 Defendant(s). : MOTION TO AMEND
 : per RULE 15 of F.R. of Civ.
 : Procedure
 :
 : and
 :
 : MOTION FOR AN INJUNCTION
 : per RULE 65 (b)
 :
 :

As ORDERED on the 25th day of April, 2005; by United States District Judge SUE L. ROBINSON, the above named Plaintiff respectfully moves to AMEND the above captioned Civil Action, specifically to NAME all Defendant(s) as opposed to naming Correctional Medical Systems, First Correctional Medical, and Department of Corrections as in the original Complaint.

Further; Plaintiff moves for this Honorable Court to issue an INJUNCTION against Defendant Raphael Williams, Warden of the Howard R. Young Correctional Institution, and his staff for possible retaliation for two (2) Lawsuits against them.

William F. Davis, III
SBI# 162762
Howard R. Young Correctional Inst.
P.O. Box 9561
Wilmington, DE 19809

Plaintiff, Pro Se.

Defendant Raphael Williams is employed as Warden at the Howard R. Young Corredtional Institution; (Hereinafter cited as H.R.Y.C.I.), P.O. Box 9561, Wilmington, DE 19809.

Defendant (FNU) Robinson was employed as the resident Doctor for First Correctional Medical ate the H.R.Y.C.I., P.O. Box 9561, Wilmington, DE 19809, at the time of the initial incident(s) occured.

Defendant Betty (LNU) was employed as a NURSE for both Correctional Medical Systems (CMS) and First Correctional Medical (FCM), at the H.R.Y.C.I., P.O. Box 9651, Wilmington, DE 19809.

Plaintiff will further rely on all materials previously submitted pertaing to the original COMPLAINT, as well as any other subsequent pleadings, statements, and letters relationg to Plaintiff's claim(s) in further support of this instant motion to AMEND.

Plaintiff further moves to have this Honoragle Court to issue an INJUNCTION against Warden Williams and his Staff for possible retailation and harassment for filing two (2) lawsuits against them, and further asking the Court to TRANSFER Plaintiff to S.C.I.G., (State Correctional Institution at Georgetown) so that Plaintiff can complete doing his time in peace.

I CERTIFY that the forgoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment by law.

Respectfully submitted,

Dated: _____, 2005 /s/ _____

CERTIFICATE OF SERVICE

I, William F. Davis, III, hereby swear under penalty of perjury that I have rendered service of a true and correct copy(ies) of the attached:

MOTION TO AMEND AND MOTION REQUESTING AN INJUNCTION

(Title or Type of Motion or Request)

upon the following person(s) and/or agency(ies):

Aaron R. Goldstein, Deputy
Attorney General, Wilmington,
Delaware. Counsel for Depart-
ment of Corrections.

Daniel L. McKenty, Esq.,
McCullough & McKenty, P.A.,
Wilmington, DE. Counsel for
Defendant First Correctional
Medical.

BY PLACING SAME IN A SEALED ENVELOPE, postage will be paid by the Delaware Department of Corrections/Pre-paid, and depositing same in the United States Mail at the Multipurpose Criminal Justice Facility, 1301 East 12th Street, Wilmington, Delaware.

On this ____ day of _____, 200__.

(Your signature)